

UNITED BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA

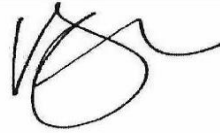
IN RE: ) Case No.: 20-00411  
)  
Ryan Electrical Services LLC, ) **MOTION TO EXTEND DEADLINE TO**  
) **FILE PROOF OF CLAIM**  
Debtor(s). )  
)  
\_\_\_\_\_ )

COMES NOW, Moser Property Maintenance, Creditor or potential creditor of the above-referenced Debtor, by and through their Attorney of Record, Kenneth P. Nelson, of the law firm of Nelson Law Firm, PLLC, and respectfully moves the Court to extend the date for the filing of a Proof of Claim.

1. The Debtor filed Chapter 11 on March 25, 2020.
2. The deadline for filing proofs of claim was June 3, 2020.
3. Creditor disputes the amount listed owing and has on this date provided invoices to the undersigned showing a total balance due and owing of \$51,439.00 as opposed to the scheduled amount of \$37,921.75
4. Debtor will not be unduly prejudiced by the filing of Creditor's proof of claim as less than two weeks has passed since the deadline and Debtor has yet to file its Chapter 11 Plan.

WHEREFORE, Creditor, Moser Property Maintenance, respectfully requests that the Court enter an Order granting Creditor an extension of deadline to file Proof of Claim.

Respectfully submitted,  
NELSON LAW FIRM, PLLC



By: \_\_\_\_\_  
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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 15, 2020, a true and correct copy of the above and foregoing instrument was electronically filed with the Clerk of the Bankruptcy Court using the CM/ECF system, which sent notification of such filing to the following:

Robert Cardell Gainer  
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West Des Moines, IA 50266  
Attorney for Debtor

Douglas Dean Flugum  
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Trustee

United States Trustee  
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